UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

S3 05 Cr. 621 (KMK)

- against -

ECF CASE

ALBERTO WILLIAM VILAR, a/k/a "Albert Vilar," and GARY ALAN TANAKA,

Defendants.

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT, upon the accompanying Affirmation in Support of Motion to Withdraw, dated November 24, 2006, Kobre & Kim LLP will move this Court, before the Honorable Kenneth M. Karas, United States District Court Judge for the Southern District of New York, located at 500 Pearl Street, New York, New York, at a date and time to be fixed by the Court for an Order permitting Kobre & Kim LLP and all of its attorneys and employees to withdraw from this matter.

Dated: November 24, 2006 New York, New York

Respectfully submitted,

KOBRE & KIM LLP

By: /s/ Steven G. Kobre

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Tanaka

TO: UNITED STATES ATTORNEY Southern District of New York One Saint Andrews Plaza New York, New York 10007

Attn: AUSA Marc O. Litt